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10 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION**

14 **-and-**

15 **PACIFIC GAS AND ELECTRIC**
COMPANY,

16 **Debtors**

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**JOINDER TO OMNIBUS OBJECTIONS
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS (SUBSTANTIVE) TO
CLAIMS FILED BY THE DEPARTMENT
OF HOMELAND SECURITY/FEDERAL
EMERGENCY MANAGEMENT AGENCY
(CLAIMS NOS. 59692, 59734 & 59783)
AND TO CLAIMS FILED BY
CALIFORNIA GOVERNOR'S OFFICE
OF EMERGENCY SERVICES (CLAIM
NOS. 87748, 87754, & 87755)**

Date: February 26, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Re: Docket Nos. 4943, 5096, 5319, 5320

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26 John Caslin and Phyllis Lowe (together, the “**Tubbs Preference Plaintiffs**”), in the above-
27 captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company, as debtors
28 and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) hereby support and join the

1 following objections filed by the Official Committee of Tort Claimants (the “TCC”): (i) *Omnibus*
2 *Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by the*
3 *Department of Homeland Security/Federal Emergency Management Agency (Claim Nos. 59692,*
4 *59734 & 59783) [Dkt. No. 4943] (the “TCC FEMA Objection”); (ii) Supplement To Omnibus*
5 *Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by the*
6 *Department of Homeland Security/Federal Emergency Management Agency (Claim Nos. 59692,*
7 *59734 & 59783) [Dkt. No. 5319] (the “TCC Supplemental FEMA Objection”) (iii) Omnibus*
8 *Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by California*
9 *Governor’s Office of Emergency Services (Claim Nos. 87748, 87754, & 87755) [Dkt. No. 5096]*
10 *(the “TCC Cal OES Objection”); and (iv) Supplement to Omnibus Objection of the Official*
11 *Committee of Tort Claimants (Substantive) to Claims Filed by California Governor’s Office of*
12 *Emergency Services (Claim Nos. 87748, 87754, & 87755) [Dkt. No. 5320] (the “TCC*
13 **Supplemental Cal OES Objection,”** and together with the TCC FEMA Objection, the TCC
14 Supplemental FEMA Objection, and the TCC Cal OES Objection, the “**Objections**”). The Fire
15 Victims also hereby support and join in the additional arguments stated in the Joinder of Fire
16 Claimants in TCC’s Objections to Claims by FEMA and Cal OES filed by Thomas Tosdal, Esq.,
17 on behalf of his clients.

18 **JOINDER**

19 Pursuant to Section 502(b)(1) of the Bankruptcy Code, a claim is not allowed if the claim
20 “is unenforceable against the debtor . . . under any . . . applicable law.” 11 U.S.C. § 502(b)(1). The
21 Fire Victims support and join in all arguments asserted in the Objections.

22 The Tubbs Preference Plaintiffs reserve all rights to be heard before the Court in connection
23 with the Objections (and any joinders thereto), to amend, supplement, or otherwise modify this
24 Joinder prior to or during the preliminary hearing on the Objections, and to assert such other and
25 further objections prior to the final adjudication of the matter.

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1 For the reasons set forth in the Objections, the Fire Victims respectfully request that the Court enter
2 an order disallowing and expunging the FEMA Claims and the Cal OES Claims identified in the
3 Objections.

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5 Dated: February 12, 2020

ROBINS CLOUD LLP



6 By: _____
7 Bill Robins III

8 *Counsel for John Caslin and Phyllis Lowe*
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